

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In Re:)
)
USA GYMNASTICS,¹) Case No. 18-09108-RLM-11
)
Debtor.)
)

**MOTION TO SHORTEN NOTICE ON MOTION FOR DETERMINATION THAT
AUTOMATIC STAY DOES NOT APPLY OR ALTERNATIVELY, FOR RELIEF FROM
AUTOMATIC STAY WITH 30-DAY WAIVER**

Bela Karolyi, Martha Karolyi, and Karolyi Training Camps, LLC (collectively, the “**Karolyi Parties**”), by counsel, for their *Motion to Shorten Notice on Motion for Determination that Automatic Stay Does Not Apply or Alternatively, for Relief from Automatic Stay*, hereby moves the Court for an entry of an order, substantially similar to the Order attached as **Exhibit A**, pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure, and Rule 9006-1(a) of the Local Rules of the United States Bankruptcy Court for the Southern District of Indiana, and in support state as follows:

1. The Karolyi Parties filed their *Motion for Determination that Automatic Stay Does Not Apply or Alternatively, for Relief from Automatic Stay* (“**Motion for Relief**”) on April 4, 2017. (Dkt. No. 385).

2. The relief sought in the Motion for Relief is related to and in certain aspects opposite of the relief sought by the Debtor in the *Motion for Preliminary Injunction* (the “**Preliminary Injunction Motion**”) filed on March 29, 2019 in Adversary

¹ The last four digits of Debtor’s federal tax identification number are 78771. The location of Debtor’s principal offices is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

Proceeding No. 19-50075. The Preliminary Injunction Motion is set for hearing on April 17, 2019 at 1:30 p.m.

3. Because motions will likely require the same evidence and argument, the resources of the parties and the Court would be best conserved by hearing both motions during the same setting.

4. Bankruptcy Rule 9006(c) and Local Rule 9006-1(a) permit the consideration of motions on shortened notice for cause.

NOTICE

5. The Karolyi Parties will provide notice of this Motion and any Order issued in accordance with Local Rule 9006(d) and 9006-1(e).

WHEREFORE, the Karolyi Parties respectfully request the Court enter an Order, substantially similar to the Order attached as **Exhibit A**, and grant all other just and proper relief.

Respectfully submitted,

/s/ Sarah L. Fowler

Sarah L. Fowler, #30621-49
MATTINGLY BURKE COHEN & BIEDERMAN LLP
155 E. Market Street, Suite 400
Indianapolis, IN, 46204
317-614-7320
sarah.fowler@mbcblaw.com

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system:

Steven Baldwin sbaldwin@psrb.com, rmatthews@psrb.com
Martin Beeler mbeeler@cov.com
Daniel D. Bobilya dan@b-blegal.com
Tonya J. Bond tbond@psrb.com
Wendy D Brewer wbrewer@fmdlegal.com
Kenneth H. Brown kbrown@pszjlaw.com
George Calhoun george@ifrahlaw.com
John Cannizzaro john.cannizzaro@icemiller.com,
Deborah Caruso dcaruso@rubin-levin.net
Dianne Coffino dcoffino@cov.com
Karen M Dixon kdixon@skarzynski.com
Laura A DuVall Laura.Duvall@usdoj.gov
Jeffrey B. Fecht jfecht@rbelaw.com, rmccclintic@rbelaw.com
Steven W Golden sgolden@pszjlaw.com
Gregory Michael Gotwald ggotwald@psrb.com
Manvir Singh Grewal mgrewal@4grewal.com
Susan N Gummow sgummow@fgppr.com
Katherine Hance khance@goodwin.com
Jeffrey M. Hester jhester@hbkmfirm.com
Jeffrey A Hokanson jeff.hokanson@icemiller
John R. Humphrey jhumphrey@taftlaw.com
Cassandra Jones cjones@wwmlawyers.com
Bruce L. Kamplain bkamplain@ncs-law.com
Kevin P Kamraczewski kevin@kevinklax.com
Ronald David Kent ronald.kent@dentons.com
Adam L. Kochenderfer akochenderfer@wolfsonbolton.com
Christopher Kozak ckozak@psrb.com
Carl N. Kunz ckunz@morrisjames.com
Cynthia Lasher clasher@ncs-law.com
Martha R. Lehman mlehman@salawus.com
Michael M. Marick mmarick@skarzynski.com
Phillip Alan Martin pmartin@fmdlegal.com
John McDonald jmcDonald@briggs.com
Harley K Means hkm@kgrlaw.com
Geoffrey M. Miller geoffrey.miller@dentons.com
Robert Millner robert.millner@dentons.com

James P Moloy jmoloy@boselaw.com
Ronald J. Moore Ronald.Moore@usdoj.gov
Whitney L Mosby wmosby@bgdlegal.com
Joel H. Norton jnorton@rsslawoffices.com
Michael P. O'Neil moneil@taftlaw.com
Weston Erick Overturf wes.overturf@mbcblaw.com
Dean Panos dpanos@jenner.com
Stephen Jay Peters speters@kgrlaw.com
Ginny L. Peterson gpeterson@k-glaw.com
John Thomas Piggins pigginsj@millerjohnson.com
George Plews gplews@psrb.com
Amanda Koziura Quick amanda.quick@atg.in.gov
Michael L. Ralph mralph@rsslawoffices.com
Melissa M. Root mroot@jenner.com
James Pio Ruggeri jruggeri@goodwin.com
Syed Ali Saeed ali@slawfirm.com
Ilan D Scharf ischarf@pszjlw.com
Thomas C Scherer tscherer@bgdlegal.com
David J. Schwab djschwab@rsslawoffices.com
Igor Shleypak ishleypak@fgppr.com
James I. Stang jstang@pszjlw.com
Catherine L. Steege csteege@jenner.com,
mhinds@jenner.com;thooker@jenner.com
Meredith R. Theisen mtheisen@rubin-levin.net
U.S. Trustee ustpreion10.in.ecf@usdoj.gov
Susan Walker susan.walker@dentons.com
Joshua D Weinberg jweinberg@goodwin.com
Mark R. Wenzel mwenzel@salawus.com
Gabriella B. Zahn-Bielski gzahnbielski@cov.com

I hereby certify that on April 4, 2019, a copy of the foregoing was mailed by

United States mail to the following:

Marcia Frederick Blanchette
c/o Kimberly Dougherty, Esq.
Andrus Wagstaff, P.C.
19 Belmont St.
Easton, MA 02375

Alyssa Corn
c/o Megan A. Bonanni and Michael L. Pitt
Pitt McGhee Palmer & Rivers, P.C.
117 W. Fourth St., Suite 200
Royal Oak, MI 48067

Rachel Denhollander
c/o Stephen R. Drew/Adam C. Sturdivant
Drew, Cooper & Anding
80 Ottawa Ave., NW Ste. 200
Grand Rapids, MI 49503

Kenzie Gassaway
c/o Manvir S. Grewal
2290 Science Parkway
Okemos, MI 48864

Sarah Klein
c/o Manvir S. Grewal
2290 Science Parkway
Okemos, MI 48864

Alexandra Raisman
c/o John Manley
Manly, Stewart & Finaldi
19100 Von Karman Ave., Suite 800
Irvine, CA 92613

Kyla Ross
c/o John Manley
Manly, Stewart & Finaldi
19100 Von Karman Ave., Suite 800
Irvine, CA 92613

Tasha Schwikert-Warren
c/o Kevin Boyle & Jesse Creed
Panish, Shea & Boyle LLP
11111 Santa Monica Blvd., Ste. 700
Los Angeles, CA 90025

Jessica Thomashow
c/o Stephen R. Drew/Adam C. Sturdivant
Drew, Cooper & Anding
80 Ottawa Ave., NW Ste. 200
Grand Rapids, MI 49503

Stephen D Penny Jr
11121 Mirador Lane
Fishers, IN 46037

Fidelity Investments 2018
USAG Profit Sharing Contribution
100 Crosby Parkway
Covington, KY 41015

Plews Shadley Racher & Braun LLP
1346 N. Delaware St.
Indianapolis, IN 46204

American Athletic, Inc
200 American Ave
Jefferson, IA 50129

PNC Bank
P.O. Box 828702
Philadelphia, PA 19182

National Travel Systems-Corporate Office
4314 S Loop 289, Suite 300
Lubbock, TX 79413

Wipfli LLP
12359 Sunrise Valley Drive
Reston, VA 20191

The Alexander
333 South Delaware Street
Indianapolis, IN 46204

John Cheng
137 Danbury Rd. #141
New Milford, CT 06776

Benchmark Rehabilitation Partners
PO Box 2314
Ooltewah, TN 37363

AT&T
P.O. 105414
Atlanta, GA 30348

Sport Graphics, Inc.
3423 Park Davis Circle
Indianapolis, IN 46235

BMI
P.O. Box 630893
Cincinnati, OH 45263

Tatiana Perskaia
7633 Hamelin Lane
Gainesville, VA 20155

Antonia Markova
3535 Acorn Way Lane
Spring, TX 77389

Daniel Baker
1311 Kelliwood Oaks Drive
Katy, TX 77450

Ivan Yordanov Ivanov
700 Cobia Drive
Katy, TX 77494

Neofunds By Neopost
P.O. Box 6813
Carol Stream, IL 60197

Carey International, Inc.
7445 New Technology Way
Frederick, MD 21703

Mary Lou Ackman
1939 Butler Dr
Bartlett, IL 60103

Armine Barutyan-Fong
1409 NW Northridge
Blue Springs, MO 64015

Terin Humphrey
114 SE 2nd Street
Blue Springs, MO 64014

Staples Business Credit
P.O. Box 105638
Atlanta, GA 30348

Denison Parking
c/o Virginia Ave. Garage
P.O. Box 1582
Indianapolis, IN 46206

Elite Sportswear, L.P.
6850 Enterprise Dr.
South Bend, IN 46628

Dodson Group Inc
P.O. Box 393
Bownsburg, IN 46112

Chainey Umphrey
1415 Melwood Dr
San Joe, CA 95054

Heather M. Forbes
1170 White Chapel
Algonguin, IL 60102

Champion Rx
5481 Commercial Dr., Suite C
Huntington Beach, CA 92649

Aflac
1932 Wynnton Road
Columbus, GA 31999

/s/ Sarah L. Fowler
Sarah L. Fowler